

2067 william Sanko1.txt

1

1 DPONENT  
2 being first duly sworn, as hereinafter  
3 certified, was examined and testified as  
4 follows:

5 - - - - -  
6 CROSS-EXAMINATION

7 BY 6789:

8 Q Can you please state your name.

9 A It's Bill Sanko, William John Sanko.

10 Q Can you please state your address and  
11 telephone number.

12 A The address is 6590 Jamelia Court,  
13 Fairview, Pennsylvania. Phone number is  
14 814-474-1517.

15 Q Mr. Sanko, I will be asking you a series of  
16 questions today. After I'm done, Mr. Gutkin  
17 will likely then ask you some more questions.  
18 If you do not understand a question, please tell  
19 us --

20 A Okay.

21 Q -- and we will either clarify the question  
22 or repeat it for you.

23 A All right.

24 Q Is that acceptable?

25 A Yes.

TACKLA & ASSOCIATES

2

1 Q Great. Mr. Gutkin may object to a question  
2 I ask, I may object to a question that

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5 Q -- facility at Motorola or Indala?

6 A No.

7 Q What are the names of the people at  
8 Motorola that you've had contact with over the  
9 years?

10 A You know, I was just trying to think of  
11 that because I did talk to a guy from Motorola  
12 and I did talk to a guy from Indala. I don't  
13 remember the names.

14 Q Is there any document that you could look  
15 at that could refresh your recollection?

16 A Yes.

17 Q Do you have that document with you today?

18 A No, I don't. I probably have it on my  
19 address in my address book on my computer, and  
20 I'd be glad to get that for you. I might even  
21 have it in the file. I did talk to a guy from  
22 Motorola more times than Indala, but I'd have  
23 both of those names and I would have files -- I  
24 believe that that would be the press pad files  
25 that would have their names in there.

TACKLA & ASSOCIATES

85

1 Q When was the last time you had contact with  
2 someone at Motorola or Indala?

3 A Oh, boy. Motorola was a long time ago and  
4 I'm going to say maybe five, six, seven years;  
5 and Indala, three, four years.

6 Q Three, four years ago?

7 A Yes. I quoted them a laminator, Indala,  
8 and they didn't purchase it, they purchased a

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9 competitor's laminator.

10 Q What year did you quote that laminator?

11 A Oh, it's a good three, four years ago.

12 Q Okay.

13 A Oh, I'm wrong. It wasn't Indala, it was

14 HID Corporation. So I'm wrong.

15 Q Okay. We're going to switch gears again.

16 Prior to 1995, are you aware of any

17 laminators that were used to laminate plastic

18 cards having a hard object between plastic

19 sheets?

20 A I don't recall when chip cards came along.

21 I don't know. See, the date I'm not sure of. I

22 can't honestly tell you. I mean, somewhere

23 along the line I became aware of the fact that

24 they were putting chips in cards, but when that

25 was, I don't know. I've never done it.

TACKLA & ASSOCIATES

86

1 Q when you say chip in cards, do you mean a  
2 chip between two sheets of plastic?

3 A Yeah.

4 Q Okay.

5 A well, chip between. They were never  
6 imbedded, they were always placed in a drilled  
7 or milled pocket, that's the way they decided to  
8 do it. I've never seen them imbedded like Keith  
9 does it.

10 You know, I've been in I don't know  
11 how many plants, I've been in almost everyone's

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12 plant and talked to them about processes, I've  
13 never seen that imbedding process done. I'm  
14 confident it was never done prior to Keith doing  
15 it, but that's my own opinion, I'm going on  
16 record as saying that.

17 Q So in your experience, gosh, since 1977  
18 with Sanko Sales, the plastic cards that you've  
19 come across over the years have been simply  
20 sheets --

21 A Of plastic.

22 Q -- of plastic, one stacked on top of the  
23 other and laminated?

24 A Yes.

25 Q Okay.

TACKLA & ASSOCIATES

87

1 A I can't -- I can't even say that ever one  
2 of my laminators was used to make chip cards. I  
3 don't personally know that. I mean, I've never  
4 even had anybody say that we intend to use it  
5 for this purpose, strictly plastic cards.

6 Q Could the laminators you designed in the  
7 '80s have been used to laminate --

8 A I don't know.

9 1234: Object.

10 Q -- a chip between two plastics sheets?

11 1234: Object.

12 A I honestly don't know.

13 1234: Object to form.

14 A Maybe. I don't know.

15 1234: If I object, let me  
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